

SUMMARY OF RECOMMENDATIONS

Part I Overall Findings and Recommendations

6.1 Reasonable Program Modifications and General Practices

6.1.1 Department Practices Which Require Modification

Action:

1. Develop criteria for determining reasonable modifications to provide program accessibility. DPR will also have to determine which modifications would fundamentally alter the nature of the program or result in undue financial and administrative burden. This would be of concern in those DPR programs that are linked to unique sites such as Hanauma Bay Nature Park and the botanic gardens.

TR Unit
Dec., 2000

The PMRS policy for determining reasonable modifications in its Children and Youth Program Manual can be expanded and clarified to be applicable to all DPR programs.

2. Develop an access policy and implementation manual which clearly sets forth policy and instruction to staff on the overall requirements and procedures for implementing reasonable modifications. The manual should also cover topics such as handling requests, complaints and grievances. A resource section for making information available in alternate formats

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Dec., 2000

6.1.2 Eligibility Criteria

Action:

1. The DPR policy and Implementation manual should include a clear policy on eligibility criteria to ensure that persons with

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Dec., 2000

disabilities are not directly or indirectly discriminated against.

6.2 General Publicity and Advertising

Action:

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| 1. | Provide an access policy and implementation manual to all divisions/sections/program personnel to ensure that access information in publicity and advertising is handled in a consistent manner throughout the Department. | TR Unit
Dec, 2000 |
| 2. | Increase outreach to persons with disabilities by using alternate formats for communicating with persons with disabilities rather than just printed text. Increased radio and television publicity is recommended to reach a wider audience. | All
Divisions
Ongoing
(ADA
Comm.) |
| 3. | Publicize the Department's programs and services through organizations that work with persons with disabilities or whose membership is predominantly made up of persons with disabilities. | All
Divisions
Ongoing |
| 4. | Include the Department's Non-discrimination Policy or similar statement in all general informational publications; provide a poster-size format of the policy and post it in all public park locations. | All
Divisions
Ongoing |
| 5. | Ensure that all announcements and applications include: <ul style="list-style-type: none">- Policy of Non-discrimination- Information on site accessibility (accessible restrooms, parking, bus routes, meeting rooms, etc.)- TDD/TTY phone number for information or requests for assistance- Availability of alternate formats- A reasonable deadline for requests, if | All
Divisions
Ongoing |

necessary.

- | | |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------|
| 6. Expand available information on the DPR website to include accessible program sites, TDD numbers, accessible campsites, availability of all-terrain wheelchairs, etc. | Management
Services
Ongoing |
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6.3 Visual Communication

Action:

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| 1. Provide an access policy and implementation manual to all divisions/sections/program personnel to ensure that there is a clear understanding among staff of the requirement to provide information in alternate formats. | TR Unit
Dec., 2000 |
| 2. Publications should carry the notice that: <i>This publication can be made available upon request in alternate formats. Call _____ for assistance.</i> Determine which alternate formats may be prepared and available, and which would be handled on an individual basis. | All
Divisions
Ongoing |
| 3. Improve design of visual displays to incorporate alternate formats for communicating information. For example, minimum font size for printed information; verbal descriptions or taped information; and pictorial signage can be attractively incorporated into displays. | All
Divisions
Ongoing |
| 4. Develop DPR capabilities to provide alternate formats by identifying equipment that can be purchased, borrowed and shared and establishing contracts for communication services that can be used throughout the Department. | TR Unit,
ADA
Committee
Aug, 2000 |

6.4 Aural/Oral Communication

Action:

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| 1. Provide an access policy and implementation | |
|------------------------------------------------|--|

- manual to all divisions/sections/program personnel to ensure that staff are able to provide alternate formats when requested. TR Unit
Dec, 2000
2. Provide a sign language interpreter (and include that information in publicity) for all major special events without waiting for an individual request. DF-71
contract
in place
 3. Provide TDD and staff training at all key program offices including:
 - 4 PMRS District Offices (East Honolulu, West Honolulu, Leeward/Central Oahu, and Windward Oahu)
 - Beautification Division Office
 - Foster Botanical Garden
 - Ho'omaluhia Botanical Garden
 - Park Maintenance and Recreation Services Administration
 - Personnel Services Office
 - Parks Permit Section (under Department of Information and Complaint)
 - Kapiolani Regional Park
 - McCoy Pavilion
 Completed,
updated
annually
 4. List the TDD numbers in the telephone book.
 5. Develop DPR capabilities to provide alternate formats by identifying equipment that can be shared and assigned to a resource unit. Identify and develop community resources from which equipment may be borrowed. MS, annual

TR Unit,
ADA
Committee
Aug, 2000
 6. Establish contracts for communication services that can be used throughout the Department.

6.5 Staff Training

Action:

1. Develop a training plan to ensure that all employees receive appropriate and adequate training to ensure accessible programs and

Completed,
Updated
annually

services. The training plan should identify the types of training needed by staff depending on their responsibilities, i.e., maintenance personnel, program staff, and customer service staff.

ADA comm.,
Ongoing

2. All department staff should receive basic LIFE program training, including volunteers and part-time staff.

3. Develop and provide an access policy and implementation manual to all divisions/sections/program personnel to ensure that access policy and procedure is known and implemented in a consistent manner throughout the Department.

TR Unit
Ongoing

TR Unit
Dec., 2000

6.6 Contracts, Concessions, Permit Holders

Action:

1. Develop through rule making or contract language requirements for ADA compliance whenever programs or services are provided on behalf of, or in conjunction with, the DPR or through the use of properties under its control.
2. Ensure that the above mentioned programs have accessible advertising and that the entities are prepared to make reasonable modifications.

Mgt Svcs
Sept, 2000

6.7 Emergency Evacuation Procedures

Mgt Svcs

Action:

1. Develop overall guidelines and staff training for emergency evacuation of persons with disabilities addressing different types of emergencies and different disabilities. These can then be used by each program unit/site to develop its specific evacuation plan.

PMRS
Crisis Mgt

2. Review the staff role as civil defense emergency shelter managers to make sure that the needs of persons with disabilities are taken into consideration.

Committee
June 2000

6.11 Ongoing Accessibility Improvements and Compliance Program

Action:

PMRS
Crisis Mgt
Committee
June 2000

1. Designate a Department ADA coordinator who will be responsible for the overall compliance program. The coordinator should be someone who:
 - Has direct access to and accountability to the Director of the Department.
 - Has sufficient training and background to administer the program.
 - Will act as liaison to the DPR Access Advisory Council.
 - Will act as liaison to the City's ADA Committee.
 - Will chair the DPR ADA committee consisting of representatives from each division.
 - Will coordinate and update the DPR Transition Plan.
2. Reactivate the DPR ADA Committee consisting of representatives from each division. The purpose of the committee would be to coordinate, plan, and evaluate accessibility efforts in training, publicity and communication, policy and practice, physical barrier removal, etc.

Director
March 2000
Completed

Director
July 2000

Part II Division Reports

6.12 Management Services Division (MS)

Action:

1. Install a TDD at the Parks Permit Section and

provide staff training.

2. Review all parks concession permits and agreements to ensure that contractors and permittees meet the requirements of ADA, Title II when they provide programs and services on behalf of the City. FY02
3. Implement recommended changes to rules and regulations (see Section 5.2). Sept 2000

6.13 Personnel Services Office

Action:

1. The Personnel Office counter is not accessible to persons in wheelchair. Modifications or accommodation should be planned/implemented. Ongoing
2. Staff need training in operating the TDD situated at the reception desk and LIFE training (sensitivity and awareness of persons with disabilities) to improve customer service and accessibility to the Department's programs and services. Completed

6.14 Park Maintenance and Recreation Services Division (PMRS)

Update
needed
July 2000

Action: Separate Programs for Disabled

1. It is recommended that as long as there is sufficient interest, the STAR, PATH, WISP, and Fun and Fitness programs should be continued. It is also recommended that staff continue to seek other organizations that may be able to take over the program(s) or to assist some to operate independently.

Ongoing

Action: Aquatics Programs and Services

1. Staff need ongoing training in maintenance and use of equipment and how to provide

assistance to swimming pool users,
particularly with regards to the use of lifts
and wheelchairs.

2. McCully and Aiea Swimming Pools should be re-evaluated for accessibility and placement on the transition plan priority list. Ongoing
3. Aquatic staff need additional training for inclusion of persons with disabilities in swimming and other aquatic activities. Guidelines for making program modifications in aquatics activities should be included in the Departmental access manual. Eval. Rpt. June 2000

Action: People's Open Market Ongoing

1. Make sure that vendors are informed of requirements of Title II, ADA.
2. A signal horn is used to start and end market sales at each site. Alternate forms of communication should be explored to communicate with persons with hearing disabilities. Initial, Aug 2000

Action: Hanauma Bay Nature Preserve Education Program June 2000

1. The interpretive/educational displays rely on text and pictures, and some three dimensional objects. Alternate means of communication for persons with visual disabilities is necessary to make the information accessible.
2. Some guided walks are in areas where it is not desirable nor feasible to modify the environment to make the program accessible. To do so would alter the nature of the activity. Therefore, some means of ensuring an equal benefit to persons with disabilities is necessary. Focus groups, consultation with experts, and/or assistance from the DPR Access Advisory Council may provide some creative solutions. Docents available FY02

Action: Beach Access

1. PMRS should re-evaluate maintenance and management of the all-terrain wheelchairs and beach mats assigned to the respective districts. The Beach Access Task Force expressed continued concern regarding this problem.
2. Follow-up on Beach Access Task Force recommendation to explore expansion of all-terrain wheelchairs program to campsites. Completed

Action: Priorities for Accessible Facilities

1. The current Transition Plan for compliance with ADAAG for barrier removal will be updated shortly. The division should re-evaluate the priorities assigned to parks. The past priorities were based on level of usage, recreational opportunities and geographic location. Furthermore, work on outdoor recreational facilities was generally deferred because design standards were not in place. ADA Comm, Oct, 2000
July, 2000
2. Take into consideration unique recreational opportunities or cases in which DPR limits certain activities to certain parks. The Koko Head Shooting Ranges is an example. It is the only facility of its kind on the island, and therefore, it should receive a higher priority for renovation or reconstruction to meet ADA accessibility standards. July 2000

6.15 Beautification Division

Action:

1. Ensure that contractors that provide tree trimming and beautification services on behalf of the City are made aware of ADA Title II requirements.

2. Staff need LIFE training to understand how their activities may affect and impact programs and services of the Department.

Ongoing

6.16 Honolulu Botanical Gardens (HBG)

Action:

1. Ensure that the Friends of Honolulu Botanical Gardens, in its various activities at the gardens, are aware of the requirements of ADA, Title II. Offer LIFE training to the organization's officers and committee chairpersons.

Ongoing

2. Include LIFE training for docents and volunteers.

Ongoing

3. Similar to Hanauma Bay Nature Preserve, some guided walks in the gardens are in areas where it is not desirable nor feasible to modify the environment to make the program accessible. To do so would alter the nature of the activity. Therefore, some means of ensuring an equal benefit to persons with disabilities is necessary. Focus groups, consultation with experts, and/or assistance from the DPR Access Advisory Council may provide some creative solutions.

Ongoing

Dec, 2000

4. Each of the botanical gardens is an unique environment, and they are in widespread locations. The feasibility of moving activities from one garden to another is limited. Some general horticultural classes might not be site dependent, but other activities, such as a garden tour, are site specific. DPR should re-evaluate the priority listing of the botanical gardens in its Transition Plan. It is also recommended that HBG develop a program access plan for each of the botanical gardens.

July 2000

5. Because the operations of the Community Gardens Program are established in DPR Rules

and Regulations, comments and recommendations are made in that section (Section 5.2, No. 20). Only Manoa Community Garden is accessible to persons in wheelchairs. At some gardens, parking and restrooms are also not available. The original premise of the program was to make under used or undeveloped park property available for this activity. DPR provides the land, irrigation, and overall management of the program. However, considering the broad interpretation of program and service afforded under the ADA, Title II, it is recommended that the community gardens be re-evaluated for accessibility. For example, while it may not be necessary for every community garden to have wheelchair access, HBG should develop an access plan for this program to take into consideration usage, geographic locations, and availability of parking and restrooms.

Ongoing

6.15 Maintenance Support Services Division (MSS)

Action:

1. Ensure that contractors that provide maintenance and repair services on behalf of the City are made aware of ADA Title II requirements.
2. Staff need LIFE training to understand how their activities may affect and impact programs and services of the Department.

Ongoing

Ongoing